

Hearing Date: September 20, 2023, at 10:00 a.m. (ET)

Objection Deadline: July 14, 2023

Reply Deadline: August 18, 2023

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

UBS EUROPE SE (f/k/a UBS (LUXEMBOURG)
S.A.), UBS FUND SERVICES (LUXEMBOURG)
S.A., UBS THIRD PARTY MANAGEMENT
COMPANY S.A., M&B CAPITAL ADVISERS
SOCIEDAD DE VALORES, S.A., RELIANCE
INTERNATIONAL RESEARCH LLC,
LUXEMBOURG INVESTMENT FUND AND
LUXEMBOURG INVESTMENT FUND U.S.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Proc. No. 10-05311 (CGM)

**ORAL ARGUMENT
REQUESTED**

EQUITY PLUS, as represented by their
Liquidators MAÎTRE ALAIN RUKAVINA and
PAUL LAPLUME, MAÎTRE ALAIN
RUKAVINA and PAUL LAPLUME, in their
capacities as liquidators and representatives of
LUXEMBOURG INVESTMENT FUND AND
LUXEMBOURG INVESTMENT FUND U.S.
EQUITY PLUS,

Defendants.

**NOTICE OF RELIANCE INTERNATIONAL RESEARCH LLC'S MOTION TO
DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Reliance International Research LLC's ("RIR") Motion to Dismiss the Second Amended Complaint and the accompanying Declaration of Mark J. Hyland, dated as of the date hereof and exhibits thereto, and all prior pleadings and proceedings herein, Defendant RIR will move this Court on September 20, 2023 at 10 a.m. (Eastern Time), or as soon thereafter as counsel may be heard, for an order dismissing the Second Amended Complaint (ECF No. 284) filed by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered on February 23, 2023, any opposition to the Motion shall be filed by July 14, 2023 and any reply in further support of the Motion shall be filed by August 18, 2023.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, RIR does not consent to the entry of final orders or judgment by this Court.

New York, New York
May 5, 2023

Respectfully submitted,

SEWARD & KISSEL LLP

By: /s/ Mark J. Hyland

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